

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

E.S., an individual,

Plaintiff,

v.

BEST WESTERN INTERNATIONAL, INC.;
MARRIOTT INTERNATIONAL, INC;
EXTENDED STAY AMERICA, INC; G6
HOSPITALITY, LLC; WYNDHAM
HOTELS AND RESORTS, INC; AND
CHOICE HOTELS INTERNATIONAL, INC.

Defendants.

CIVIL ACTION NO. 3:20-CV-00050-M

Chief Judge Barbara M. G. Lynn

**BEST WESTERN INTERNATIONAL, INC.’S RESPONSE TO PLAINTIFF’S MOTION
FOR A PROTECTIVE ORDER AND LEAVE TO PROCEED ANONYMOUSLY**

Defendant, Best Western International, Inc. (“BWI”), through undersigned counsel, hereby responds to Plaintiff’s Motion for a Protective Order and Leave to Proceed Anonymously, and states as follows:

BWI agrees with and adopts the positions set forth in codefendant Wyndham Hotels & Resorts, Inc.’s response to Plaintiff’s Motion for a Protective Order and for Leave to Proceed Anonymously [Dkt. 30]. The allegations contained in Plaintiff’s Complaint are personal and sensitive. However, Plaintiff intends to amend her Complaint (*see* Dkt. 39-40), and Defendants have not had the opportunity to review and respond to the Amended Complaint, either by Answer or Motion to Dismiss. Thus, BWI respectfully requests the Court hold Plaintiff’s request to proceed anonymously in abeyance until Defendants have answered or moved against the Amended Complaint.

Should the Court decide to address Plaintiff's motion before Defendants address the Amended Complaint, BWI respectfully requests the Court permit limited disclosure of Plaintiff's identity for the purposes of discovery, including, but not limited to, disclosure of her current name, name at the time of the alleged trafficking (if different), date of birth, Social Security Number, current address, address at the time of the alleged trafficking, and the names of Plaintiff's parents and/or guardians at the time of the alleged trafficking. This information would permit Defendants to conduct a fair and thorough investigation of Plaintiff's allegations. Specifically, Defendants would be able to obtain and verify applicable police or hospital records and identify potential witnesses. BWI, presumably in accord with Plaintiff and Red Lion Hotels Corporation, is confident the parties and the Court can construct a Discovery Plan and Order that satisfies all parties' needs.

BWI is amenable to Plaintiff's request to proceed anonymously in public, pre-trail filings, so long as Defendants are permitted discretion to use her identity and relevant information for the good-faith purpose of conducting discovery, to which Defendants are entitled.

Dated: April 3, 2020

Respectfully submitted,

/s/ Nicole Ordonez
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/s/ Karen L. Campbell

Karen L. Campbell, Esq.
Motion for *Pro Hac Vice* Admission

Pending

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Attorneys for Defendant

Best Western International, Inc.

CERTIFICATE OF SERVICE

I hereby certify on the 3rd day of April 2020, the foregoing was served on counsel of record through the Court's electronic filing system, and to all parties without an appearance by conventional mail.

/s/ Nicole Ordonez

Nicole Ordonez